

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both)
individually and as Legal Guardian of)
SHANE ALLEN LOVELAND, et al.,)
Plaintiffs,)
v.)
THE GOODYEAR TIRE & RUBBER COMPANY,)
Defendant.)

Case No. 8:18-cv-00127

**THE GOODYEAR TIRE &
RUBBER COMPANY'S
TRIAL EXHIBIT LIST**

Trial Date(s): March 17, 2020, 10 days

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Rcvd/ Not Rcvd	Date
	1000.	Tire at issue, right rear					
	1001.	Wheel at issue, right rear					
	1002.	Companion tire, left front					
	1003.	Companion tire, right front					
	1004.	Companion tire, left rear					
	1005.	Goodyear Gadsden Tire Specifications, Light Truck-Radial-Light Duty, Size LT235/85R16 (GY_Susman_28939 to 29010)					
	1006.	LT235/85R16 Wrangler HT design drawings (GY_Susman_36466-36473)					
	1007.	Goodyear Global Master Specifications (GY_Susman_36300-36465)					
	1008.	Component Parts Animation (LT 235/85R16 Wrangler HT)					
	1009.	Tire Building Animation (LT 235/85R16 Wrangler HT)					
	1010.	Impact Separation Animation					
	1011.	Over-deflection Animation					
	1012.	Enhanced image of localized separation in tire at issue demonstrating polishing and adhesion					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1013.	Nebraska State Patrol Incident Report and Call History dated May 1, 2015					
	1014.	State of Nebraska Investigator Motor Vehicle Accident Report, Case No. C15-07916, Date of Accident: May 1, 2015					
	1015.	State of Nebraska Investigator Motor Vehicle Accident Report Overlays 1 and 2					
	1016.	Nebraska State Patrol scene photographs (GY-NESP 0001-0062)					

GOODYEAR'S EXPERTS

	1017.	Report: Joseph Grant, dated May 9, 2019					
	1018.	Curriculum Vitae: Joseph Grant					
	1019.	RR Subject Tire Examination Notes					
	1020.	LF Companion Tire Examination Notes					
	1021.	Composite Exhibit					
	1022.	360 degree tire photograph (RR MDORNJHV244)					
	1023.	360 degree tire x-ray (RR MDORNJHV244)					
	1024.	Charts (Survey: Analyses of Casings; Used Tire Survey Data Summary; Used Tire Surveys					
	1025.	X-rays, individual, all tires					
	1026.	X-rays Southwell, all tires					
	1027.	Companion tire photographs					
	1028.	Subject tire photographs					
	1029.	Shearography of companion tires					
	1030.	Tire Industry Association <i>Passenger & Light Truck Tire Conditions Manual</i> , 2005					
	1031.	The Pneumatic Tire, edited by A. N. Gent and J. D. Walter, Published 2005 by the National Highway Traffic Safety Administration; Chapters 15 and 16.					
	1032.	Herzlich, Harold J., "The Effect of Snaked Belt Anomalies on Tire Durability", International Tire Exhibition and Conference, 2000					
	1033.	"Impact Simulations-What happens when a tire/wheel impacts a road hazard" by Gary Bolder, John Smith, and Timothy Flood of Standards Testing Labs, 2005					
	1034.	"Structural Impact Damage Under Varying Laboratory					

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		Conditions" by Gary Bolden of STL, ITEC 2006.					
	1035.	"Influence of road hazard impact on radial car tires" by Vandy Price of Michelin and Glenn Follen, Rubber & Plastics News, May 14, 2018					
	1036.	ITEC 2004, Paper 45D – "Rim Line Grooves as an Indicator of Underinflated or Overloaded Tire Operation in Radial Tires" by Joseph L. Grant					
	1037.	Compression Grooving as an Indicator of Over-Deflected Operating Conditions in Tires, Standards Testing Laboratories, Inc., Schnuth, Fuller, Follen, Gold, June 1997					
	1038.	Compression Grooving and Rim Flange Abrasion as Indicators of Over-Deflected Operating Conditions in Tires, Standards Testing Laboratories, Inc., Schnuth, Fuller, Follen, Gold, Smith, October 1997					
	1039.	Effects of Over-Deflection on the Tire/Rim Interface, Standards Testing Laboratories, Inc., Schnuth, Smith, Bolden, Flood, September 1998					
	1040.	2001 Northwestern Traffic Collision manual, Chapter 8					
	1041.	The Tire and Rim Association load and inflation tables, 1990 Year Book					
	1042.	"The Effect of Underinflation on Tire Operating Temperature", Jenny Paige, ITEC 2012.					
	1043.	ITEC 2004 - "Component Interfacial Tearing Appearances" by Gary Bolden.					
	1044.	Tire Care & Safety – 2013 RMA					
	1045.	"X-Ray Study of Sixty (60) Worn out Passenger & Light Truck Tires" Joseph L Grant, ITEC 2012, including x-rays					
	1046.	"Belt Misalignments and Belt/Belt Tear Patterns" by Harold J. Herzlich of Herzlich Consulting, Inc.					
	1047.	"Typical Manufacturing Conditions in Steel Belted Radial Tires: Do They Influence Tire Durability?", Vandy Price and Joseph Grant, ITEC 2016.					
	1048.	The Tire Technology Conference, October 28-29, 1986, Clemson University, "What Makes a High Performance Tire Different Than a Regular Tire?"					
	1049.	"Vehicle Response Comparison to Tire Tread Separations Induced by Circumferential Cut and Distressed Tires", SAE 2007-01-0733 by D. Tandy, Granat, Durisek, K. Tandy, Baldwin & Pascarella.					

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	1050.	RMA Scrap Tire Project, dated December 19, 2005					
	1051.	Michelin – Passenger & Light Truck Tire Owner's Manual & Limited Warranty					
	1052.	DOT HS 809 361 – "Tire Safety, Everything Rides On It", NHTSA					
	1053.	RMA - Care and Service of Automobile and Light Truck Tires (9/95)					
	1054.	"Tire Forensic Investigation, Analyzing Tire Failure" By Thomas R. Giapponi, SAE R-387.					
	1055.	Tire Examination Following Accidents, Topic 825 of the Traffic-Accident Investigation Manual, James Gardner and J. Stannard Baker					
	1056.	Impact simulations in the lab, G.C. Bolden, J.M. Smith, and T. R. Flood, STL, Tire Technology International 2001					
	1057.	Impact Demonstration Study conducted by STL, with photos – Piard, 2006					
	1058.	Impact Demonstration Study conducted by STL, with photos – Prince, 2002					
	1059.	Tire Examination after Motor Vehicle Collisions, Chapter 8, Calvin P. McClain, Jr. and Michael A. DiTallo, Northwestern University Center for Public Safety					
	1060.	Traffic Crash Investigation, Lynn B. Fricke and J. Stannard Baker, Northwestern University Center for Public Safety, 11 th Edition, 2014					
	1061.	2011 RMA Care and Service of Passenger & Light Truck (LT) Tires.					
	1062.	Commercial Medium Tire Debris Study, NHTSA HS 811 060, December 2008					
	1063.	Forensic Analysis in Tire Tread Separations, John W. Daws, Rubber and Plastic News, March 5, 2007					
	1064.	Care and Service of Commercial Truck and Bus Tires, U.S. Tire Manufacturers Association, 2017					
	1065.	Tire Care & Safety – 2013 RMA					
	1066.	"Bead Compression Grooving: Characteristics and Influence of the Deflection" by Jean Claude Brico, ITEC, 2004					
	1067.	Tyre Damage and Its Causes, Continental 2005/2006					
	1068.	"Tire Inflation Pressure and Temperature" – independent research					

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	1069.	United States Patent No. 4,724,881, Poque, et al., Pneumatic Vehicle Tire issued February 16, 1988					
	1070.	Cord Shadowing on Innerliner by Joe Grant					
	1071.	Examples of Tires with Nylon Cap Ply/Strips that have experienced Tread and Top Steel Belt Detachments					
	1072.	The safety impact of Vehicle-related road Debris, G. Forbes, J. Robinson Ph.D., prepared for AAA Foundation for Traffic Safety, June 2004					
	1073.	Goodyear Web Site – Announcements Talking Points Messages Proactive Tire Replacement for some LR-E tires Specific to 15-Passenger Vans					
	1074.	Goodyear Web Site- Goodyear Responds to Set Record Straight On Misleading Reports					
	1075.	Goodyear Web Site - Load Range E Tire Backgrounds Information					
	1076.	Goodyear Web Site- Dear Goodyear Customer November, 2000					
	1077.	Goodyear - The Complete Tire Safety Guide					
	1078.	NHTSA Firestone Steeltex Investigative Reports 02					
	1079.	Report: Arthur Gray Beauchamp dated May 6, 2019					
	1080.	Curriculum Vitae: Arthur Gray Beauchamp					
	1081.	“File Notes Caption Report - A121365W00” (redacted) (BLAIR000016)					
	1082.	Handwritten notes by Mr. Beauchamp					
	1083.	Expert Testimony for Mr. Gray Beauchamp since 2014					
	1084.	Document with tire dimensions (outer diameter, outer radius, width)					
	1085.	Color photographs (15 pages, various vehicles)					
	1086.	Memorandum: From Daniel Koch re Optional Tire Sizes, dated April 12, 2019					
	1087.	Digital Images: -aerial (3); -scene inspection: 8/31/18 by DT (175), 4/17/19 by SF (175); -vehicle inspection: 10/4/18 Chevy by GB (487), 10/4/18 Chevy by SF (396); tires by GB 11/21/18 (359)					

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	1088.	Inspection notes: Chevrolet					
	1089.	Inspection notes: tires					
	1090.	Sequence graphics (pages 337-340 of Steven Fenton's reconstruction document)					
	1091.	Vehicle dynamics: -2013-01-0776: test-data; test-movies; test-reports; 2013 comparison of 25 high speed tire disablements involve full and partial tread seps.pdf -2017-01-1427: test-data; test-movies; test-reports; 2017-(koch-beauchamp-pentecost)- tire disablement deceleration.pdf -NADS: study with videos					
	1092.	Tread Vehicle Interaction: -Subject Vehicle Damage (18 photographs) -Test Vehicle Damage -BMW (11 photographs) -Expedition (12 photographs) -Malibu (15 photographs) -Minivan (21 photographs)					
	1093.	Baker, J. Stannard, "Tire Disablements and Accidents on a High-Speed Road," The Traffic Institute's Tire Study, April 1968.					
	1094.	Beauchamp, Gray, et al., "A Comparison of 25 High Speed Tire Disablements Involving Full and Partial Tread Separations", SAE International, published 04/08/2013.					
	1095.	Gardner, Jim. "The Role of Blowouts in Accident Causation," Publication no. 87-WA/SAF-4. New York City: American Society of Mechanical Engineers, 1987.					
	1096.	Gardner, Jim. "The Role of Tread/Belt Detachment in Accident Causation," ITEC 1998, Paper 27A.					
	1097.	Gardner, J.D., Queiser, B.J., 2006. "The Pneumatic Tire," Report DOT HS 810 561, US Department of Transportation, National Highway Traffic Safety Administration, Washington, DC, USA, February 2006, ch 15.					
	1098.	Gillespie, Thomas D., <u>Fundamentals of Vehicle Dynamics</u> , Society of Automotive Engineers Warrendale, PA, 1992.					
	1099.	Fay, R., Robinette, R., Smith, J., Flood, T. et al., "Drag and Steering Effects from Tire Tread Belt Separation and Loss," SAE Technical Paper 1999-01-0447, 1999, doi:10.4271/1999-01-0447.					

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	1100.	Klein, E. and Black, T., "Anatomy of Accidents Following Tire Disablements", SAE Technical Paper 1999-01-0446, 1999, doi:10.4271/1999-01-0446.					
	1101.	Koch, Daniel, et al., "Deceleration Rates of Vehicles with Disabled Tires", SAE International, published 03/28/2017.					
	1102.	Liu, C., Ye, T.J., "Run-Off-Road Crashes: An On Scene Perspective," NHTSA DOT HS 811 500, 2011.					
	1103.	Lowne, R.W., "Tyre Failures on Part of M5 Motorway", Transport and Road Research Laboratory, TRRL Report LR 585, Crowthorne, Berkshire, 1973.					
	1104.	Robinette, R., Deering, D., and Fay, R., "Drag and Steering Effects of Under Inflated and Deflated Tires," SAE Technical Paper 970954, 1997, doi:10.4271/970954.					
	1105.	Tandy, D., Granat, K., Durisek, N., Tandy, K. et al., "Vehicle Response Comparison to Tire Tread Separations Induced by Circumferentially Cut and Distressed Tires," SAE Technical Paper 2007-01-0733, 2007, doi:10.4271/2007-01-0733.					
	1106.	Tandy, D., Pascarella, R., Ault, B., Coleman, C. et al., "Steering and Handling Performance During a Full Tire Tread Belt Separation," SAE Int. J. Passeng. Cars – Mech. Syst. 4(1):791-806, 2011, doi:10.4271/2011-01-0973.					
	1107.	Tandy, D., Ault, B., and Pascarella, R., "Steering and Handling Performance Following a Full Tire Tread Belt Separation," SAE Technical Paper 2012-01-0257, 2012, doi:10.4271/2012-01-0257.					
	1108.	Tandy, D., Ault, B., Colborn, J., and Pascarella, R., "Objective Measurement of Vehicle Steering and Handling Performance When a Tire Loses Its Air," SAE Int. J. Passeng. Cars - Mech. Syst. 6(2):741-769, 2013, doi:10.4271/2013-01-0748.					
	1109.	Wierwille, W.W., Casali, J.G., "Driver Steering Reaction Time to Abrupt-Onset Crosswinds, as Measured in a Moving-Base Driving Simulator," Human Factors: The Journal of the Human Factors and Ergonomics Society, February 1983, vol. 25, no. 1103-116, doi: 10.1177/00187208830250011.					
	1110.	Young, D., Heckman, G., Kim R., "Human Factors in Sudden Acceleration Incidents," Proceedings of the Human Factors and Ergonomics Society Annual Meeting 2011 55: 1938, DOI:0.1177/1071181311551404.					
	1111.	Ranney, Thomas A., et al., Investigation of Driver Reactions to Tread Separation Scenarios in the National					

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		Advanced Driving Simulator (NADS) U.S. Department of Transportation, National Highway Traffic Safety Administration, DOT HS 809 523, January 2003.					
	1112.	Rucoba, Robert, et al., An analysis of Driver Reactions to Tire Failures Simulated with the National Advanced Driving Simulator (NADS). Sixth International Driving Symposium on Human Factors in Driver Assessment, Training and Vehicle Design. 2011.					
	1113.	Rucoba, R., Liebbe, R., Duran, A., and Carr, L., "The Effectiveness of the National Advanced Driving Simulator (NADS) in Evaluating the Effect of Tire Tread Belt Detachments," SAE Technical Paper 2013-01-0467, 2013, doi:10.4271/2013-01-0467.					
	1114.	Report: Stephen Fenton, dated May 6, 2019					
	1115.	Curriculum Vitae: Stephen Fenton					
	1116.	Scene Survey Data, 8/31/18					
	1117.	Scene Diagram					
	1118.	Scratch Pattern Diagram					
	1119.	Photographs marked at Mr. Fenton's deposition					
	1120.	Roll Diagram					
	1121.	CDR/Kineticorp Analysis Alignment					
	1122.	Drive Train Analysis					
	1123.	Yaw and Trip Analysis					
	1124.	Roll Velocity and Ground Plane Velocity v. Number of Rolls					
	1125.	Gilbert Engineering Accident Calculations					
	1126.	Roll Phase Dynamics					
	1127.	Diagram (untitled)					
	1128.	Accident Sequence and Calculations					
	1129.	Loveland Photos					
	1130.	Photograph with handwritten notes					
	1131.	Yaw Phase Diagram zoomed in					

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	1132.	Roll Phase Diagram zoomed in					
	1133.	Subject Crash Comparison to Steer-Induces Rollover Testing					
	1134.	Quarter Turn Analysis					
	1135.	RPM/Gear Analysis					
	1136.	3D Reconstruction Screenshots					
	1137.	Scans (pick-up)					
	1138.	Photogrammetry Diagrams					
	1139.	Diagrams created from Photogrammetry					
	1140.	Fenton reconstruction: <ul style="list-style-type: none"> • Digital Images (89-210) • Scene Diagram (211-219) • Photogrammetry (220-286) • Inertial Parameters (260-286) 					
	1141.	2 e-scan data: <ul style="list-style-type: none"> • Raw scan data • Scan-images 					
	1142.	Baker, Kenneth S., Chapter 9: <i>Photogrammetry for Collision Analysis</i> , Traffic Collision Investigation. Evanston: Northwestern University Center for Public Safety, 2001.					
	1143.	Brach, Raymond M. Chapter 10: <i>Photogrammetry, Vehicle Accident Analysis and Reconstruction Methods</i> . Warrendale: Society of Automotive Engineers, 2005.					
	1144.	Breen, Kevin C. <i>Application of Photogrammetry to Accident Reconstruction</i> , SAE Technical Paper 861422. Warrendale: Society of Automotive Engineers, 1986.					
	1145.	Chou, C., McCoy, R., Le, J., Fenton, S. et al., <i>Image Analysis of Rollover Crash Tests Using Photogrammetry</i> , SAE Technical Paper 2006-01-0723, 2006, doi:10.4271/2006-01-0723.					
	1146.	Fenton, S. and Kerr, R., <i>Accident Scene Diagramming Using New Photogrammetric Technique</i> , SAE Technical Paper 970944, 1997, doi:10.4271/970944.					
	1147.	Fenton, S., Johnson, W., LaRocque, J., Rose, N. et al., <i>Using Digital Photogrammetry to Determine Vehicle Crush and Equivalent Barrier Speed (EBS)</i> , SAE Technical Paper 1999-01-0439, 1999, doi:10.4271/1999-					

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		01-0439.					
	1148.	Fenton, S., Neale, W., Rose, N., and Hughes, C., <i>Determining Crash Data Using Camera Matching Photogrammetric Technique</i> , SAE Technical Paper 2001-01-3313, 2001, doi:10.4271/2001-01-3313.					
	1149.	Fenton, S., Ziernicki, R., Rose, N., and Johnson, W., <i>Using Digital Photogrammetry to Determine Crash Severity</i> , Rep. London: ICrash 2000, International Crashworthiness Conference, The Royal Aeronautical Society, 2000.					
	1150.	Husher, Stein E., Michael S. Varat, and John F. Kerhoff. <i>Survey of Photogrammetric Methodologies for Accident Reconstruction</i> , Rep. Vancouver: Proceedings of the Canadian Multi-Disciplinary Road Safety Conference VII, 1991.					
	1151.	Funk, J., Beauchamp, G., Rose, N., Fenton, S. et al., <i>Occupant Ejection Trajectories in Rollover Crashes: Full-Scale Testing and Real World Cases</i> , SAE Int. J. Passeng. Cars - Mech. Syst. 1(1):43-54, 2009, doi:10.4271/2008-01-0166.					
	1152.	Neale, W., Hessel, D., and Terpstra, T., <i>Photogrammetric Measurement Error Associated with Lens Distortion</i> , SAE Technical Paper 2011-01-0286, 2011, doi:10.4271/2011-01-0286.					
	1153.	Neale, W., S. Fenton, S. McFadden, and N. A. Rose. <i>A Video Tracking Photogrammetry Technique to Survey Roadways for Accident Reconstruction</i> , SAE Technical Paper 2004-01-1221. Warrendale: Society of Automotive Engineers, 2004.					
	1154.	Pepe, Michael D. <i>Accuracy of Three-Dimensional Photogrammetry as Established by Controlled Field Tests</i> , SAE Technical Paper 930662. Warrendale: Society of Automotive Engineers, 1993.					
	1155.	Rose, N., Neale, W., Fenton, S., Hessel, D. et al., <i>A Method to Quantify Vehicle Dynamics and Deformation for Vehicle Rollover Tests Using Camera-Matching Video Analysis</i> , SAE Int. J. Passeng. Cars - Mech. Syst. 1(1):301-317, 2008, doi:10.4271/2008-01-0350.					
	1156.	Rucoba, R., A. Duran, L. Carr, and D. Erdeljac. <i>A Three Dimensional Crush Measurement Methodology Using Two-Dimensional Photographs</i> , SAE Technical Paper 2008-01-0163. Warrendale: Society of Automotive Engineers, 2008.					

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	1157.	Woolley, R., White, K., Asay, A., and Bready, J., <i>Determination of Vehicle Crush from Two Photographs and the Use of 3D Displacement Vectors in Accident Reconstruction</i> , SAE Technical Paper 910118, 1991, doi:10.4271/910118.					
	1158.	Beauchamp, G., Hessel, D., Rose, N., Fenton, S. et al., <i>Determining Vehicle Steering and Braking from Yaw Mark Striations</i> , SAE Int. J. Passeng. Cars - Mech. Syst. 2(1):291-307, 2009, doi:10.4271/2009-01-0092.					
	1159.	Daily, John, Nathan S. Shigemura, and Jeremy Daily. <i>Fundamentals of Traffic Crash Reconstruction</i> , Jacksonville: Institute of Police Technology and Management, University of North Florida, 2006.					
	1160.	Fricke, Lynn B. <i>Traffic Accident Reconstruction</i> , Evanston, IL: Northwestern University Traffic Institute, 1990.					
	1161.	Fricke, Lynn B. <i>Traffic Crash Reconstruction, 2nd Edition</i> , Evanston, IL: Northwestern University Traffic Institute, 2010.					
	1162.	Reveley, Mary S. <i>A Comparison Study of Skid and Yaw Marks</i> , SAE Technical Paper 890635. Warrendale: Society of Automotive Engineers, 1989.					
	1163.	Bare, Cleve, Brian Everest, Donald Floyd, and Douglas Nunan. <i>Analysis of Pre-Crash Data Transferred over the Serial Data Bus and Utilized by the SDM-DS Module</i> , SAE Technical Paper 2011-01-0809. Warrendale: Society of Automotive Engineers, 2011.					
	1164.	Bortles, W., Biever, W., Carter, N., and Smith, C., <i>A Compendium of Passenger Vehicle Event Data Recorder Literature and Analysis of Validation Studies</i> , SAE Technical Paper 2016-01-1497, 2016, https://doi.org/10.4271/2016-01-1497 .					
	1165.	Bortles, W., Koch, D., Beauchamp, G., Pentecost, D. et al., "Event Data Recorder Performance during High Speed Yaw Testing Subsequent to a Simulated Tire Tread Separation Event," SAE Technical Paper 2019-01-0634, 2019, doi:10.4271/2019-01-0634.					
	1166.	Gabler, H. Clay, John Hinch, and John Steiner. <i>Event Data Recorders - A Decade of Innovation</i> , Rep. no. PT-139. Warrendale: Society of Automotive Engineers, 2008.					
	1167.	Ishikawa, Hirotoshi, et al. <i>Study on Pre-Crash and Post-Crash Information Recorded in Electronic Control Units (ECUs) Including Event Data Recorders</i> , Japan, Paper					

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		Number 09-0375.					
	1168.	Lawrence, Jonathan M., Craig C. Wilkinson, David J. King, Bradley E. Heinrichs, and Gunter P. Siegmunds. <i>The Accuracy and Sensitivity of Event Data Recorders in Low-Speed Collisions</i> , SAE Technical Paper 2002-01-0679. Warrendale: Society of Automotive Engineers, 2002.					
	1169.	Lawrence, Jonathan M., and Craig C. Wilkinson. <i>The Accuracy of Crash Data from Ford Restraint Control Modules Interpreted with Revised Vetrynix Software</i> , SAE Technical Paper 2005-01-1206. Warrendale: Society of Automotive Engineers, 2005.					
	1170.	Niehoff, Peter. <i>Evaluation of Event Data Recorders in Full Systems Crash Tests</i> , Rep. no. 05-0271. Washington D.C.: National Highway Traffic Safety Administration.					
	1171.	Steiner, John C. <i>Event Data Recorder Pre-Crash Data Sources for General Motors Vehicles</i> , Rep. no. IMECE2003-41812. American Society of Mechanical Engineers International Mechanical Engineering Congress & Exposition, 2003.					
	1172.	Wilkinson, Craig C. <i>The Accuracy and Sensitivity of 2003 and 2004 General Motors Event Data Recorders in Low-Speed Barrier and Vehicle Collisions</i> , SAE Technical Paper 2005-01-1190. Warrendale: Society of Automotive Engineers, 2005.					
	1173.	Arndt, Mark W., et al., <i>Drag Factors from Rollover Crash Testing For Crash Reconstructions</i> , Rep. no. IMECE2011-65537. American Society of Mechanical Engineers International Mechanical Engineering Congress & Exposition, 2011.					
	1174.	Arndt, Mark W., et al., <i>Comparison of Linear Variable Deceleration Rate Rollover Reconstruction to Steer-Induced Rollover Tests</i> , SAE Technical Paper 2012-01-0469. Warrendale: SAE International, 2012.					
	1175.	Asay, Alan F. et al. <i>Rollover Testing of Sport Utility Vehicles (SUVs) on an Actual Highway</i> , SAE Technical Paper 2010-01-0521. Warrendale: Society of Automotive Engineers, 2010.					
	1176.	Carter, Jarrod W. et al. <i>Rollover Dynamics: An Exploration of the Fundamentals</i> , SAE Technical Paper 2008-01-0172. Warrendale: Society of Automotive Engineers, 2008.					
	1177.	Funk, James R., <i>Trajectory Model of Occupants Ejected in Rollover Crashes</i> , SAE Technical Paper 2007-01-0742.					

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		Warrendale: Society of Automotive Engineers, 2007.					
	1178.	Koch, D., Beauchamp, G., and Pentecost, D., <i>Deceleration Rates of Vehicles with Disabled Tires</i> , SAE Technical Paper 2017-01-1427, 2017.					
	1179.	Luepke, Peter, et al. <i>An Evaluation of Laminated Side Window Glass Performance During Rollover</i> , SAE Technical Paper 2007-01-0367. Warrendale: Society of Automotive Engineers, 2007.					
	1180.	Rose, Nathan A., Beauchamp, Gray, Fenton, Stephen J. <i>Factors Influencing Roof-to-Ground Impact Severity: Video Analysis and Analytical Modeling</i> , SAE Technical Paper 2007-01-0726. Warrendale: Society of Automotive Engineers, 2007.					
	1181.	Rose, Nathan A., Beauchamp, Gray, Fenton, Stephen J. <i>Analysis of Vehicle-to-Ground Impacts during a Rollover with an Impulse-Momentum Impact Model</i> , SAE Technical Paper 2008-01-0178. Warrendale: Society of Automotive Engineers, 2008.					
	1182.	Rose, Nathan A. Beauchamp, Gray, Fenton, Stephen J. <i>The Influence of Vehicle-to-Ground Impact Conditions on Rollover Dynamics and Severity</i> , SAE Technical Paper 2008-01-0194. Warrendale: Society of Automotive Engineers, 2008.					
	1183.	Rose, Nathan A., and Gray Beauchamp. <i>Development of a Variable Deceleration Rate Approach to Rollover Crash Reconstruction</i> , SAE Technical Paper 2009-01-0093. Warrendale: Society of Automotive Engineers, 2009.					
	1184.	Rose, Nathan A., and Gray Beauchamp. <i>Analysis of a Dolly Rollover with PC-Crash</i> , SAE Technical Paper 2009-01-0822. Warrendale: Society of Automotive Engineers, 2009.					
	1185.	Rose, Nathan A., and Gray Beauchamp. <i>A Variable Deceleration Approach to Rollover Crash Reconstruction</i> , Collision Magazine, Vol. V, Issue I, Spring 2010.					
	1186.	Stevens, Don C., et al., <i>Rollover Crash Test Results: Steer-Induced Rollovers</i> , SAE Technical Paper 2011-01-1114. Warrendale: Society of Automotive Engineers, 2011.					
	1187.	Report: Ernest Goss, Ph.D., dated May 10, 2019					
	1188.	Curriculum vitae: Ernest Goss, Ph.D.					
	1189.	Report: Life Care Plan for Shane Loveland, by Cathlin Mitchell, RN, BSN, dated May 3, 2019					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1190.	Curriculum vitae: Cathlin Mitchell, RN, BSN					
	1191.	Report: Independent Medical Exam, Alan Weintraub, M.D., with supplement dated May 8, 2019					
	1192.	Curriculum vitae: Alan Weintraub, M.D.					
	1193.	Photocopies of CT Scans from Dr. Weintraub's deposition					
	1194.	Life Expectancy after Traumatic Brain Injury (TBI)					
	1195.	Photographs of the home from Dr. Weintraub's deposition					
	1196.	Letter to Craig Lichtblau M.D. from Dennis B. Marcus of DB Marcus Construction, Inc. re: Wheelchair Accessible Home, 1/14/16					
	1197.	Dr. Weintraub's handwritten notes					
	1198.	Documented Telephone Conversation with Dr. Chad Murray by Craig Lichtblau M.D., 6/30/17					

Goodyear reserves the right to use as an Exhibit any reference identified by its experts in the course of discovery, which may not have been specifically referenced herein.

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
DEPOSITION EXHIBITS							
	1199.	Buser Exhibit 2: Fixed Asset Item for 2005 Chevy Pickup					
	1200.	Buser Exhibit 4: Dandee Construction Employee Manual and Safety Policy					
	1201.	Fedderson Exhibit 1: Kearney Invoice 91571 (GY-KTR 0024)					
	1202.	Fedderson Exhibit 2: Kearney Invoice 92265 (GY-KTR 0025)					
	1203.	Fedderson Exhibit 3: Handwritten DOT code					
	1204.	Gilbert Exhibit 1: Gilbert Engineering - Loveland Core Documents					
	1205.	Gilbert Exhibit 2: Gilbert Testimony List					
	1206.	Gilbert Exhibit 4: 3-12-19 Gilbert Report					
	1207.	Gilbert Exhibit 5: Scene Diagram					
	1208.	Gilbert Exhibit 6: Accident Calculations					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1209.	Gilbert Exhibit 7: Case Sheet and Notes Vehicle Inspection					
	1210.	Gilbert Exhibit 8: Handwritten Notes of Scene Inspection					
	1211.	Lichtblau Exhibit A: Invoice and updated CV					
	1212.	Lichtblau Exhibit B: Trials and Depositions lists					
	1213.	Pettingill: Invoice for his deposition in this matter					
	1214.	Pettingill: Deposition Testimony list					
	1215.	Pettingill: Trial Testimony list					
	1216.	Southern Exhibit 4: Vehicle Placard photograph					
	1217.	Southwell Exhibit 1: Handwritten notes by David Southwell in preparation for deposition					
	1218.	Southwell Exhibit 2: Images attached to David Southwell's report, photographs and X-rays					
	1219.	Southwell Exhibit 3: Diagram of tire drawn by David Southwell					
	1220.	Southwell Exhibit 4: Photographs (dandee RF comp_: 90, 0, 135, 45, 270, 180, 315, 225)					
	1221.	Southwell Exhibit 5: Photographs of left rear tire (dandee LR comp_: 90, 0, 135, 45, 270, 180, 315, 225)					
	1222.	Southwell Exhibit 6: Photographs of left front tire (dandee LF comp_: 90, 0, 135, 45, 270, 180, 315, 225)					
	1223.	Southwell Exhibit 7: Southwell C.V.					
	1224.	Southwell Exhibit 8: Case List					

Subject to the rulings on motions in *limine* and objections to exhibits, The Goodyear Tire & Rubber Company reserves the right to introduce into evidence the following exhibits:

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1225.	NHTSA file regarding Investigation PE00-046, non-confidential (GY_Susman_00001 to 01374)					
	1226.	NHTSA file regarding Investigation PE00-046, confidential (GY_Susman_01375 to 06325; GY_Susman_20845 to 25871)					
	1227.	Product Service Bulletins (GY_Susman_06326 to 06331 GY_Susman_20832 to 20837)					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1228.	Technical tests and studies conducted by Goodyear during the Subject Tire Frame regarding Tire Service Life (GY_Susman_20778 to 20831)					
	1229.	Adjustment data for the Subject Tire during the Subject Tire Scope (GY_Susman_20838 to 20844)					
	1230.	LT235-85R16 LRE Claims Were DOT Serial Indicated Probable Prodn 1992-1998 (GY_Susman_36695 to 36844)					
	1231.	LT235-85R16 LRE Claims Were DOT Serial Indicated Possible Prodn 1992-1998 (GY_Susman_36845 to 36864)					
	1232.	Claims_NHTSA sizes other than LT235-84R16 (GY_Susman_36865 to 37021)					
	1233.	2.5.03 Deposition of William Gaudet , and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_33309 to 33698)					
	1234.	2.27.13 Deposition of Eric Mizner, and related exhibits produced in discovery, in <i>Ochoa-Garcia</i> (GY_Susman_30664 to 30697)					
	1235.	12.6.02 Deposition of Dennis O'Connor, and related exhibits produced in discovery, in <i>Boerm</i> (GY_Susman_30494 to 30663)					
	1236.	2.6.03 Deposition of Dennis O'Connor, and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_33805 to 34004)					
	1237.	1.26.05 Deposition of Richard Olsen, and related exhibits produced in discovery, in <i>Hebert</i> (GY_Susman_29668 to 30170 and GY_Susman_30445 to 30450)					
	1238.	2.27.03 Deposition of Terrence Parsons, and related exhibits produced in discovery, in <i>Garcia</i> (GY_Susman_34387 to 34548)					
	1239.	1.27.05 Deposition of Beale Robinson, and related exhibits produced in discovery, in <i>Hebert</i> (GY_Susman_29011 to 29060 and GY_Susman_29188 to 29318)					
	1240.	4.12.06 Deposition of Beale Robinson (V1), and related exhibits produced in discovery, in <i>Ruiz</i> (GY_Susman_34887 to 36299)					
	1241.	2.7.03 Deposition of Antonio Settimio, and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_34156 to 34308)					
	1242.	2.6.03 Deposition of Charles Sinclair, and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_34005 to					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
		34083)					
	1243.	2.5.03 Deposition of Gary Tatum, and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_33699 to 33804)					
	1244.	2.28.03 Deposition of Keith Trares, videotape, and related exhibits produced in discovery, in <i>Garcia</i> (GY_Susman_34715 to 34886; GY_Susman_36513)					
	1245.	1.16.03 Deposition of Richard Olsen, and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_33230 to 33308)					
	1246.	1.23.02 Deposition of Ernest C. Kessell, and related exhibits produced in discovery, in <i>Garcia</i> (GY_Susman_07595 to 07695; GY_Susman_26270-26278)					
	1247.	1.25.05 Deposition of Joseph Zekoski, and related exhibits produced in discovery, in <i>Hebert</i> (GY_Susman_30451 to 30493)					
	1248.	1.4.02 Deposition of Joseph Zekoski, videotape, and related exhibits produced in discovery, in <i>Boerm</i> (GY_Susman_14616 to 14683; GY_Susman_36518; GY_Susman_28015 to 28017)					
	1249.	1.4.02 Deposition of Richard Olsen, videotape, and related exhibits produced in discovery, in <i>Boerm</i> (GY_Susman_08365 to 08533; GY_Susman_36500)					
	1250.	10.17.01 Deposition of Joseph Zekoski, videotape, and related exhibits produced in discovery, in <i>Ebanks</i> (GY_Susman_10540 to 10738; GY_Susman_36519; GY_Susman_30700)					
	1251.	10.18.01 Deposition of Richard Olsen, videotape, and related exhibits produced in discovery, in <i>Ebanks</i> (GY_Susman_08212 to 08364; GY_Susman_36501; GY_Susman_30701)					
	1252.	10.18.02 Deposition of Bertram Bell, and related exhibits produced in discovery, in <i>Arredondo</i> GY_Susman_06332 to 06423)					
	1253.	10.18.02 Deposition of Charles Sinclair, and related exhibits produced in discovery, in <i>Arredondo</i> (GY_Susman_12505 to 12547)					
	1254.	10.30.02 Deposition of Chester Patterson, and related exhibits produced in discovery, <i>Linzer</i> (GY_Susman_11752 to 11944)					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1255.	10.31.02 Deposition of Michael Trout, and related exhibits produced in discovery, in <i>Linzer and Dow</i> (GY_Susman_19196 to 19441)					
	1256.	11.1.02 Deposition of Keith Trares, and related exhibits produced in discovery, in <i>Linzer and Dow</i> (GY_Susman_18954 to 19195)					
	1257.	12.3.01 Deposition of Daniel E. Hammontree, and related exhibits produced in discovery, in <i>Garcia</i> (GY_Susman_15209 to 15535; GY_Susman_25872 to 25963; GY_Susman_26781 to 26843; GY_Susman_26846 to 26898; GY_Susman_26967 to 26970)					
	1258.	12.4.01 Deposition of Beale Robinson (V1), videotape, and related exhibits produced in discovery, in <i>Garcia</i> (GY_Susman_15536 to 15791; GY_Susman_36508)					
	1259.	12.4.01 Deposition of Dane E. Taylor, and related exhibits produced in discovery, in <i>Garcia</i> (GY_Susman_18772 to 18857)					
	1260.	12.5.01 Deposition of Beale Robinson (V2), videotape, and related exhibits produced in discovery, in <i>Garcia</i> (GY_Susman_15017 to 15208; GY_Susman_63509)					
	1261.	12.8.98 Deposition of Joseph Zekoski, and related exhibits produced in discovery, in <i>Mathews</i> (GY_Susman_20054 to 20272)					
	1262.	12.9.98 Deposition of Richard Olsen, and related exhibits produced in discovery, in <i>Mathews</i> (GY_Susman_17191 to 17467)					
	1263.	2.11.02 Deposition of Daniel E. Hammontree, and related exhibits produced in discovery, in <i>Boerm</i> (GY_Susman_18150 to 18275)					
	1264.	2.12.02 Deposition of Beale Robinson, videotape, and related exhibits produced in discovery, in <i>Boerm</i> (GY_Susman_15903 to 16013; GY_Susman_36504)					
	1265.	2.13.03 Deposition of Beale Robinson, and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_34342 to 34386)					
	1266.	2.6.02 Deposition of Charles Winebrenner, and related exhibits produced in discovery, in <i>Garcia and Ebanks</i> (GY_Susman_19442 to 19615; GY_Susman_27015 to 27441; GY_Susman_30840 to 31116)					
	1267.	2.7.03 Deposition of Douglas Julian, and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_34084 to 34155)					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1268.	2.7.03 Deposition of Thomas Watkins, and related exhibits produced in discovery, in <i>Dow</i> (GY_Susman_34309 to 34341)					
	1269.	2.8.02 Deposition of Beale Robinson, videotape, and related exhibits produced in discovery, in <i>Ebanks</i> (GY_Susman_09416 to 09622; GY_Susman_36505; GY_Susman_26899 to 26933)					
	1270.	2.8.02 Deposition of Chester Patterson, and related exhibits produced in discovery, in <i>Ebanks</i> (GY_Susman_15792 to 15902)					
	1271.	5.30.01 Deposition of Daniel E. Hammontree, and related exhibits produced in discovery, in <i>Ebanks</i> (GY_Susman_16691 to 16768; GY_Susman_31128 to 31135)					
	1272.	5.30.01 Deposition of Ernest C. Kessell, and related exhibits produced in discovery, in <i>Ebanks</i> (GY_Susman_07489 to 07594; GY_Susman_31117 to 31127)					
	1273.	6.11.02 Deposition of Beale Robinson, videotape, and related exhibits produced in discovery, in <i>Arredondo</i> (GY_Susman_14141 to 14523; GY_Susman_36502)					
	1274.	6.12.02 Deposition of Daniel Hammontree, and related exhibits produced in discovery, in <i>Arredondo</i> (GY_Susman_16547 to 16690)					
	1275.	6.7.02 Deposition of Charles Winebrenner in <i>Arredondo</i> and <i>Boerm</i> (GY_Susman_14684 to 15003; GY_Susman_27637 to 27641; GY_Susman_31136 to 31165)					
	1276.	7.11.02 Deposition of Dennis O'Connor, and related exhibits produced in discovery, in <i>Arredondo</i> (GY_Susman_17111 to 17190)					
	1277.	7.11.02 Deposition of Mark Grund, videotape, and related exhibits produced in discovery, in <i>Arredondo</i> (GY_Susman_16336 to 16546; (GY_Susman_36494)					
	1278.	7.16.02 Deposition of Joseph Zekoski (V1), videotape, and related exhibits produced in discovery, in <i>Aufiero, Linzer, Dow, and Arredondo</i> (GY_Susman_19839 to 20053; GY_Susman_36517; GY_Susman_28114 to 28154; GY_Susman_28158 to 28268)					
	1279.	7.17.02 Deposition of Joseph Zekoski (V2), videotape, and related exhibits produced in discovery, in <i>Aufiero, Linzer, Dow, and Arredondo</i> (GY_Susman_19785 to 19838; GY_Susman_36516)					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1280.	7.17.02 Deposition of Richard Olsen, videotape, and related exhibits produced in discovery, in <i>Aufiero, Arredondo</i> (GY_Susman_17643 to 17806; GY_Susman_36499; GY_Susman_28269 to 28313)					
	1281.	7.18.02 Deposition of Beale Robinson, videotape, and related exhibits produced in discovery, in <i>Arredondo, Dow, Aufiero</i> (GY_Susman_18276 to 18398; GY_Susman_36503; GY_Susman_28314 to 28328)					
	1282.	7.20.99 Deposition of Chester Patterson, and related exhibits produced in discovery, in <i>Han</i> (GY_Susman_08635 to 08725; GY_Susman_26401 to 26431)					
	1283.	7.20.99 Deposition of Ernest C. Kessell, and related exhibits produced in discovery, in <i>Han</i> (GY_Susman_07043-07098; GY_Susman_25972 to 25990)					
	1284.	8.17.01 Deposition of Ernest C. Kessell in <i>Garcia</i> (GY_Susman_07099 to 07488;GY_Susman_25991 to 26258)					
	1285.	8.3.00 Deposition of Beale Robinson (V1), videotape, and related exhibits produced in discovery, in <i>Frankl</i> (GY_Susman_18399 to 18545; GY_Susman_36506)					
	1286.	8.3.00 Deposition of Madelon Kominic, videotape, and related exhibits produced in discovery, in <i>Frankl</i> (GY_Susman_16811 to 16933; GY_Susman_36496, GY_Susman_26279 to 26326; GY_Susman_26844 to 26845; GY_Susman_31166 to 31196)					
	1287.	8.4.00 Deposition of Beale Robinson (V2), videotape, and related exhibits produced in discovery, in <i>Frankl</i> (GY_Susman_18546 to 18747; GY_Susman_36507; GY_Susman_31197 to 31543)					
	1288.	9.13.02 Deposition of Joseph Zekoski, and related exhibits produced in discovery, in <i>Corwin</i> (GY_Susman_20502 to 20771; GY_Susman_31544 to 31906)					
	1289.	9.19.00 Deposition of Edward Terrill, and related exhibits produced in discovery, in <i>Frankl</i> (GY_Susman_18858 to 18953; GY_Susman_26971 to 27014)					
	1290.	9.19.00 Deposition of James Nespo, and related exhibits produced in discovery, in <i>Frankl</i> (GY_Susman_16934 to 17110; GY_Susman_26327 to 26334)					
	1291.	9.19.02 Deposition of George Edwards, and related exhibits produced in discovery, in <i>Arredondo and Boerm</i> (GY_Susman_16171 to 16335)					

PLF Ex. No.	DEF Ex. No.	Description	Offer	Obj	Admit	Revd/ Not Revd	Date
	1292.	9.19.02 Deposition of Iwao Uenoyama, and related exhibits produced in discovery, in <i>Arredondo</i> and <i>Boerm</i> (GY_Susman_16769 to 16810)					
	1293.	9.19.02 Deposition of Ray Young (V1), videotape, and related exhibits produced in discovery, in <i>Arredondo</i> and <i>Boerm</i> (GY_Susman_19616 to 19709; GY_Susman_36515)					
	1294.	9.20.00 Deposition of Jon P. Dupont, and related exhibits produced in discovery, in <i>Frankl</i> (GY_Susman_16121 to 16170)					
	1295.	9.20.02 Deposition of Ray Young (V2 & V3), videotape, and related exhibits produced in discovery, in <i>Arredondo</i> and <i>Boerm</i> (GY_Susman_19710 to 19784; GY_Susman_36515; GY_Susman_31907 to 33229)					
	1296.	9.20.02 Deposition of Richard Olsen (V2), videotape, and related exhibits produced in discovery, in <i>Arredondo</i> (GY_Susman_15004 to 15016; GY_Susman_36498)					
	1297.	Any and all exhibits produced in discovery that cannot be attributed to any specific deposition transcript					
	1298.	2.4.03 Videotaped deposition of Robert Altvater in <i>Baerbel, Wundersee</i> (GY_Susman_36493)					
	1299.	10.17.02 Videotaped deposition of Yutaka Ito in <i>Arredondo</i> (GY_Susman_36495)					
	1300.	1.9.03 Videotaped deposition of James Stroble in <i>Wundersee</i> (GY_Susman_36511)					
	1301.	Engineering Analysis Report and Initial Decision Regarding EA00-023: Firestone Wilderness AT Tires, U.S. Department of Transportation, National Highway Traffic Safety Administration, Safety Assurance, Office of Defects Investigation, October 2001					

Goodyear reserves the right to introduce into evidence any Exhibit identified by Plaintiffs. Goodyear reserves the right to amend this list to and including entry of the Final Pre-trial Order or other deadline established by the Court.

OBJECTIONS:

- R: Relevancy
- H: Hearsay
- A: Authenticity
- O: Other (specify)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 28th day of January, 2020, the foregoing was filed electronically with the Clerk of Court, to be served by operation of the Court's electronic filing system upon all counsel of record as follows:

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